

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARY K. JONES, Individually and on Behalf	:	Civil Action No. 1:10-cv-03864-AKH
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff	:	
vs.	:	DECLARATION OF WILLIAM H.
	:	NARWOLD FILED ON BEHALF OF
PFIZER INC., et al.,	:	MOTLEY RICE LLC IN SUPPORT OF
	:	APPLICATION FOR AWARD OF
Defendants.	:	ATTORNEYS' FEES AND EXPENSES
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I, William H. Narwold declare as follows:

1. I am a member of the firm of Motley Rice LLC ("Motley Rice"). I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action.

2. This firm is counsel of record for plaintiffs.

3. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I am the member who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of "billing judgment." As a result of this review and the adjustments made, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the reductions referred to above, the number of hours spent on this litigation by my firm is 12,443.30. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney/paraprofessional time based on the firm's current rates is \$5,339,236.25. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each individual.

5. My firm seeks an award of \$23,443.51 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B.

6. The following is additional information regarding certain of these expenses:

(a) Filing, Witness and Other Fees: \$195.00. These expenses have been paid to the court for *pro hac vice* application fees. The vendors who were paid for these services are set forth in Exhibit C.

(b) Transportation, Hotels & Meals: \$2,622.08. In connection with the prosecution of this case, the firm has paid for travel expenses to attend, among other things, court hearings and to meet with experts and counsel. The date, destination and purpose of each trip is set forth in Exhibit D.

(c) Court Hearing and Deposition Reporting, and Transcripts: \$110.80. The vendors who were paid for hearing transcripts are listed in Exhibit E.

(d) Experts/Consultants/Investigators: \$7,907.04.

(i) Eric Windt (\$391.00): Translation services.

(ii) Rolf Sturner (\$3,984.79): Expert retained to provide opinion on certain foreign law issues.

(iii) Forensic Economics, Inc. (\$3,531.25). Economics and litigation consulting firm retained to provide loss analysis.

(e) Photocopying & Imaging, Duplication: \$584.25. In connection with this case, the firm made 348 in-house copies, charging \$0.23 per copy. Each time an in-house copy machine is used, our billing system requires that a case or administrative billing code be entered and that is how the 348 copies were identified as related to this case. In addition, my firm also

paid \$504.21 to outside copy vendors. A breakdown of these outside charges by date and vendor is set forth in Exhibit F.

(f) Online Legal and Financial Research: \$11,862.08. These included vendors such as Westlaw, LexisNexis, PACER, Bloomberg Finance, and Thomson Reuters. These databases were used to obtain access to SEC filings, factual databases, and legal research. This represents the expense incurred by Motley Rice LLC for use of these services in connection with this litigation. The charges for these vendors vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

8. The identification and background of my firm and its partners is attached hereto as Exhibit G.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of April, 2015, at Mt. Pleasant, South Carolina.


WILLIAM H. NARWOLD

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 6, 2015.

s/ HENRY ROSEN

HENRY ROSEN

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